

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ADAMA SOW,

Defendant.

**SEALED INDICTMENT**

23 Cr.

23 CRIM 593

**COUNT ONE**  
**(Trafficking in Counterfeit Goods)**

The Grand Jury charges:

1. From at least in or about January 2023, up to and including October 20, 2023, in the Southern District of New York and elsewhere, ADAMA SOW, the defendant, knowingly and intentionally trafficked and attempted to traffic in goods and services, and knowingly used counterfeit marks on and in connection with such goods and services, to wit, SOW used a storage facility located in New York, New York to distribute counterfeit goods including, but not limited to, counterfeit clothing, shoes, and accessories.

(Title 18, United States Code, Sections 2320(a)(1) and 2.)

**FORFEITURE ALLEGATION**

2. As the result of committing the offense alleged in Count One of this Indictment, ADAMA SOW, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2323(b), any and all articles made or trafficked as part of the commission of said offense; any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of said offense; and any and all property used, or intended to be used, in any manner or part to commit or facilitate the commission of said offense, including

but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that SOW personally obtained.

**Substitute Assets Provision**

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2323;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

Wm Paya-L 11/14/2023  
FOREPERSON

Damian Williams  
DAMIAN WILLIAMS  
United States Attorney